

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Jennifer Lynn Keirns

Case No.

2:19-mj-646

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/14/2019 in the county of Perry in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 846

Conspiracy to possess with intent to distribute over 100 grams of a mixture or substance containing a detectable amount of heroin

This criminal complaint is based on these facts:

See attached affidavit, which is incorporated by reference.

☒ Continued on the attached sheet.



Complainant's signature

Lance Jardot, SA

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/15/2019

City and state: Columbus, Ohio



Judge's signature

Elizabeth Preston Deavers, U.S. Magistrate Judge

Printed name and title



AFFIDAFIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Lance Jardot, (hereafter referred to as affiant), being duly sworn, depose and state as follows:

INTRODUCTION

Your affiant has been a Special Agent of the Drug Enforcement Administration (DEA) since February 2017, currently assigned to the Detroit Field Division, Columbus District Office. As such, your affiant is an "investigative or law enforcement officer" of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. Your affiant is empowered to investigate, to make arrests with or without warrants and to execute search warrants under the authority of 21 U.S.C. § 878.

Your affiant holds a Bachelor's Degree in Interdisciplinary Studies (Criminal Justice & Natural Sciences).

Prior to being employed by the DEA, your affiant was employed as a Special Agent for the Oklahoma Bureau of Narcotics (OBN). Your affiant has accumulated the following training and experience:

- (a) Your affiant has completed the DEA Basic Agent Training Academy; the Oklahoma Council on Law Enforcement Education and Training Basic Police Training Academy; and the Oklahoma Bureau of Narcotics – Basic Narcotics Investigator's Course.
- (b) Your affiant's specialized narcotics-related training includes drug identification, interview and interrogation, managing informants, undercover operations, conspiracy investigations, surveillance and electronic monitoring techniques, tactical application of narcotics enforcement, search and seizure law, pharmaceutical diversion, clandestine drug labs, marijuana cultivation and money laundering investigations. Your affiant receives training on a daily basis by conducting criminal narcotic investigations and drawing on the expertise of agents more experienced than your affiant.
- (c) As a DEA Special Agent, your affiant's experience includes conducting and/or participating in the following: criminal arrests, interviewing drug users and drug distributors, undercover drug buys involving both confidential sources and undercover law enforcement agents, conducting surveillance, trash seizures, and executing search and seizure warrants.

The information set forth in this affidavit comes from your affiant's personal involvement in this investigation, as well as information provided to your affiant by other law enforcement officers. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this investigation.

PROBABLE CAUSE

Since April of 2018, members of the Drug Enforcement Administration (DEA) have been investigating a drug trafficking organization operating in the Southern District of Ohio.

On August 14, 2019, at approximately 4:46 p.m., Ohio State Highway Patrol (OSHP) Trooper Drew Untied observed a black 2007 Honda Accord bearing Ohio registration HRY2983, registered to Chad JARVIS, traveling southbound on State Route 13 in Perry County, Ohio. OSHP Trooper Untied observed an equipment violation on the Honda Accord. OSHP Trooper Untied activated the emergency lights on his vehicle, signaling the driver to stop on State Route 13 near mile post 32, near Reading Township, located in the Southern District of Ohio.

As OSHP Trooper Untied was approaching the Honda Accord, he observed a marked Somerset Police Department K-9 vehicle drive past the traffic stop and he radioed to request the unit return for assistance. When OSHP Trooper Untied reached the Honda Accord, he identified the driver as Chad Eric JARVIS and the passenger as Jennifer KEIRNS. No other occupants were in the vehicle.

As Chad JARVIS was attempting to locate documents that OSHP Trooper Untied had requested, Sergeant Matt May, Unit #202, of the Somerset Police Department arrived on scene with his canine. Sergeant May deployed his canine to conduct a free-air sniff of the vehicle. Sergeant May advised Trooper Untied that his canine positively alerted to the odor of narcotics emitting from the driver's side door of the Honda Accord.

OSHP Trooper Untied placed Chad JARVIS and Jennifer KEIRNS in the back of his patrol unit to conduct a probable cause search. DEA Special Agent (SA) Anthony Martin arrived on scene and read the Miranda Warning to both Chad JARVIS and Jennifer KEIRNS, as witnessed by DEA Task Force Officer Chris Ferrington. Both Chad JARVIS and Jennifer KEIRNS waived their Miranda rights and agreed to speak with investigators.

Jennifer KEIRNS admitted they were in possession of drugs and that the drugs were concealed on Chad JARVIS. Chad JARVIS also admitted to possessing drugs concealed on his person. Chad JARVIS then voluntarily retrieved the drugs from inside of his underwear and provided them to OSHP Trooper Untied.


Chad JARVIS subsequently stated that since the beginning of 2019, he has driven to Columbus, Ohio approximately twenty (20) to thirty (30) times, each time to purchase approximately one (1) ounce to one and one half (1 ½) ounces of heroin. Chad JARVIS also stated the heroin that was purchased each time was transported to the Athens, Ohio area for redistribution amongst local customers.

Jennifer KEIRNS subsequently claimed that since the beginning of 2019, she has accompanied Chad JARVIS to Columbus, Ohio approximately fifteen (15) times, each time to purchase approximately one (1) ounce to one and one half (1 ½) ounces of heroin. Jennifer

KEIRNS also stated the heroin that was purchased each time was transported to the Athens, Ohio area for redistribution amongst local customers.

Upon returning to the Columbus District Office, the drugs were weighed (60.5 gross grams) and field tested by SA Anthony Martin as witnessed by DEA TFO Kevin Wangler. SA Anthony Martin and TFO Kevin Wangler observed a positive reaction for the presence of heroin.

Based upon the above information, your affiant submits there is probable cause to believe that Chad JARVIS and Jennifer KEIRNS conspired to possess with the intent to distribute over 100 grams of a mixture or substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 846.



Lance Jardot
Special Agent
Drug Enforcement Administration

Subscribed and sworn before me this 15th day of August, 2019.



Honorable Elizabeth Preston Deavers
Chief United States Magistrate Judge
Southern District of Ohio

